

REMARKS

Claims 13, 14, 16 through 19 and 21 through 23 are now pending in the application. In response to the Office Action dated October 5, 2004, claims 1 through 12, 15 and 20 have been cancelled, new claims 22 and 23 have been added, and claims 13, 16, 19 and 21 have been amended. Care has been taken to avoid the introduction of new matter. Favorable reconsideration and allowance of the application are respectfully solicited.

Claims 13 and 19 are the only remaining independent claims. Dependent claims 16 and 21, which previously depended from claims 15 and 20, respectively, were held to be allowable if appropriately rewritten to include the limitations of their parent claims. The recitations of claims 15 and 20 have been included, respectively, in parent independent claims 13 and 19 and claims 15 and 20 have been cancelled.

Claims 13 through 15, 19 and 20 were rejected under 35 U. S. C. § 103(a) as being unpatentable over U.S. patent 5,708,728 (Nomura) in view of U.S. patent 5,809,177 (Metcalfe), as set forth at paragraph 9 of the Office Action. It is acknowledged therein that Nomura does not disclose the following requirement of claim 13 (and similar requirement of claim 19):

a threshold operation block adding to a threshold value used in said thresholding block a second image pattern related to a first image pattern introduced into an output image as a result of an image processing provided by said input block, said thresholding block, said error calculation block and said error operation block.

Provision of such feature in the Nomura arrangement was considered to have been obvious in light of the teachings of Metcalfe. With regard to the requirement of claims 15 and 20 (which have now been incorporated in claims 13 and 19), the Office Action refers to the disclosed vertical image pattern of Metcalfe as being analogous to the vertical line pattern of Fig. 10. As both patterns are vertical lines, it was concluded that there is a predetermined angle of zero degrees therebetween.

In response to the rejection, claims 13 and 19 have been further amended to require that the second image pattern has a predetermined angle, *with an absolute value greater than zero*, relative to the first image pattern. It is submitted that there is no suggestion from the combined teachings of the references of this recited angular relationship. An angle other than zero would contradict the Metcalfe requirement for the analogous vertical line arrangement. It is submitted that claims 13, 14, 16, 19 and 21, therefore, are patentably distinguishable.

Claim 17 was rejected under 35 U. S. C. § 103(a) as being unpatentable over Nomura in view of Metcalfe and further in view of U.S. patent 5,581,371 (Spaulding). Spaulding has been relied upon solely for teaching subject matter related to the additional requirements of claim 17. Claim 18 was rejected under 35 U. S. C. § 103(a) as being unpatentable over Nomura in view of Metcalfe and further in view of U.S. patent 6,697,169 (Feng). Feng has been relied upon solely for teaching subject matter related to the additional requirements of claim 18.

Claims 17 and 18 are both dependent from claim 13 and thus contain all the requirements of the parent claim. Neither Spaulding nor Feng teach a second image pattern having a predetermined angle, *with an absolute value greater than zero*, relative to a first image pattern. It is submitted, therefore, that claims 17 and 18 are patentably distinguishable.

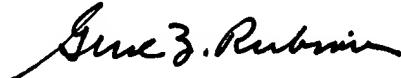
New claims 22 and 23, dependent, respectively, from independent claims 13 and 19, recite that the threshold value is changed based on the input. This feature is supported by the original disclosure at page 15, line 27, to page 16, line 11 of the specification and the description of Figs. 28-30. Claims 22 and 23 are patentably distinguishable at least for the same reasons as their respective parent claims.

Accordingly, withdrawal of the rejections and allowance of the application are respectfully solicited. To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is

hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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